

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING  
CASPER DIVISION**

THE TRIAL LAWYERS COLLEGE, a	)	CIVIL ACTION NO. 1:20-cv-0080
nonprofit corporation	)	
	)	
v.	)	
	)	
GERRY SPENCES TRIAL LAWYERS	)	JUDGE CARSON
COLLEGE AT THUNDERHEAD	)	
RANCH, <i>et al.</i>	)	MAGISTRATE JUDGE FOURATT

**PLAINTIFF’S NOTICE OF UPDATES OCCURRING SINCE  
THE JANUARY 10, 2025 HEARING**

Plaintiff, Trial Lawyers College (“TLC”), provides the following update pursuant to the Court’s request made at the January 10, 2025, hearing in this matter. Following the hearing, TLC, through its counsel, Chris Ralston, held a telephone conference with counsel for Defendants, Beth Kushner. In that phone call, TLC renewed the following offer: TLC will remove all social media content Defendants allege to be violative of the Consent Permanent Injunction (the “Injunction”)<sup>1</sup> if Defendants will agree to arrange for the property referenced in paragraph 8 of the Settlement Agreement to be returned in a reasonable time at a location convenient for both parties. Additionally, TLC proposed that both parties withdraw their motions. The parties were unable to reach an agreement.

Although the parties were unable to come to an agreement, TLC moved forward with removal of social media content. Congruent with the reasons provided by John Sloan and Maren Chaloupka at the January 10 hearing, TLC spent substantial time removing any allegedly offending social media content.<sup>2</sup> TLC could not ascertain which photographs could have violated the

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<sup>1</sup> TLC notes that the language in the Permanent Injunction regarding historical references to TLC’s time at the Thunderhead Ranch mirrors that of the Court’s Preliminary Injunction. *See* Rec. Doc. 46, pg. 19 (“To make clear, this preliminary injunction does not prohibit Defendants from: ... (3) referencing the fact that Defendants are alumni of Plaintiff and have a historical association with Plaintiff.”).

<sup>2</sup> TLC further notes that some of the social media posts that depict or refer to Defendants and/or the Thunderhead Ranch were made by third parties who “tagged” TLC. Indeed, one such post, dated October 7, 2018, was made by

Injunction as many images do not feature Defendants or their family members. These include images of gatherings, picnics, etc., where the precise location depicted is uncertain, and instances where TLC cannot ascertain with certainty the identity of every person in the photo. Accordingly, out of an abundance of caution, TLC removed every single social media post made by its accounts prior to January 1, 2020. In total, TLC removed approximately 1,500 images from its social media accounts.

Respectfully submitted,

**THE TRIAL LAWYERS COLLEGE**

/s/ Christopher K. Ralston

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Nina Hodjat, counsel of record for Defendant John Joyce in this case. TLC “untagged” itself from such posts wherever possible, and further investigated whether it could remove third parties’ posts from appearing on its social media pages. Because it does not control those third parties’ accounts or have the ability to edit their content, TLC cannot remove such posts.

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copy of the foregoing document has been served electronically by transmission to an electronic filing service provider for service through the Court's CM/ECF system to all counsel of record this 24th day of January, 2025.

/s/Christopher K. Ralston